

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

The Law Offices Of Steven D. Pertuz, LLC  
111 Northfield Avenue, Suite 304  
West Orange, NJ 07052  
Tel: (973) 669-8600  
Fax: (973) 669-8700  
SDP-5632  
spertuz@pertuzlaw.com

In Re:  
BAV AUTO, L.L.C.  
aka COSTA'S AUTO GALLERY

Case No.: 22-17933  
Chapter: 11  
Hearing Date: \_\_\_\_\_  
Judge: JKS

**APPLICATION FOR ORDER SHORTENING TIME**

The applicant Steven D. Pertuz, Esq., on behalf of  
the Debtor requests that the time period to/for  
Motion To Sell Vehicles Free and Clear as required by 363(b) and (f) be shortened  
pursuant to Fed. R. Bankr. P 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because:  
Vehicle Inventory continues to depreciate. Buyer is purchasing cash and is concerned with diminishing value with winter upon us.
2. State the hearing dates requested:  
Prior to pending motion for stay relief and Plan Confirmation which Debtor may request confirmation hearing to be postponed to allow for this motion to be heard.
3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

The applicant requests entry of the proposed order shortening time.

Date: 1/29/23

/s/ Steven D. Pertuz  
Signature